

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

SOUTH CAROLINA FREEDOM CAUCUS,

*Plaintiff,*

v.

WALLACE H. JORDAN, JR., J. DAVID WEEKS,  
BETH E. BERNSTEIN, PAULA RAWL CALHOON,  
MICAHAH P. CASKEY, IV, NEAL A. COLLINS,  
JOHN RICHARD C. KING, ROBBY ROBBINS, J.  
TODD RUTHERFORD, AND LEONIDAS E.  
STAVRINAKIS, in their official capacities as  
members of the HOUSE OF REPRESENTATIVES  
LEGISLATIVE ETHICS COMMITTEE,

*Defendants.*

Civil Action No. 3:23-cv-00795-CMC

**PLAINTIFF'S RESPONSES TO LOCAL  
CIVIL RULE 26.01 (D.S.C.)  
INTERROGATORIES**

Plaintiff responds to the Interrogatories required by Rule 26.01 of the Local Civil Rules (D.S.C.) as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE: Plaintiff is unaware of any persons or legal entities that may have a subrogation interest.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE: All the claims alleged in the Complaint should be tried nonjury, because Plaintiff has not demanded a jury trial on any claim so triable.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE: Plaintiff is not a publicly owned company. No publicly owned company is its parent, subsidiary, partner or affiliate, or owns ten percent or more of its shares.**

**Plaintiff does not own ten percent or more of any publicly owned company's outstanding shares.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE: The events giving rise to the Complaint occurred in the Columbia Division, and all Defendants reside there.**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: No.**

Respectfully submitted,

/s/ Christopher Mills

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\*motion for admission  
*pro hac vice* forthcoming

*Counsel for Plaintiff*

February 28, 2023